WRS

INLAND SEAS ENGINEERING

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August 7, 2003

Ms. Sy V. Paulik
Water Division
Michigan Department of Environmental Quality
120 West Chapin Street
Cadillac, Michigan 49601-2158

Re: Storm Water Pollution Prevention Plan (SWPPP)
Williamsburg Receiving and Storage, LLC.
10190 Munro Road
Williamsburg, Michigan 48690

Dear Ms. Paulik:

On behalf of Williamsburg Receiving and Storage, LLC (WRS), Inland Seas Engineering, Inc. (ISE) has revised the Storm Water Pollution Prevention Plan (SWPPP) as recommended in your February 18, 2003 letter. The following is a list of modifications that were made, in addition, appropriate pages have been attached for your review.

MDEQ 1. **The plan states under section 3.2 that there is no outfall, but under section 4.1, List of *Significant Materials Still Present*, has the outfall at Munro Road. This need to be clarified.**

Action 1: Section 4.1, *List of Significant Materials Still Present,* was modified in the outfall column to read No Outfall.

MDEQ 2. **The plan listed spills/leaks for 2002. Please continue these and update accordingly. You are required to keep these records for three (3) years.**

Action 2: The following text was inserted:
This table will be updated after each spill or leak and records will be maintained for a minimum of three (3) years.

MDEQ 3. **Section 3.4 lists the BOD range to be <200 mg/L. This range needs to be decreased to <20 mg/L.**

Action 3: The following footnote was added:
*= Due to removal of the Munro Road Discharge Pipe, an additional sample at the proper Method Detection Limit was not attainable. Future BOD5 analyses for evaluation of stormwater will specify a MDL < 5 mg/L

MDEQ 4. **Section 4.1, Preventative Maintenance, should include inspection of the storm basin, outfall on Munro Road, and Non-vegetative areas. The frequency should be regular whether after a rain event or otherwise.**

Action 4: The following rows were added to the table:

Equipment / Activity	Task	Frequency
Storm water Basins	Visual Inspection of basins for obstructions, erosion or other maintenance requirements	Weekly
Non-Vegetative Areas	Visual Inspection for erosion	Weekly

MDEQ 5. **Section 4.1, *Sedimentation Control Measures*, states "...re-plant exposed soils within a reasonable time following a storm event..." Please define reasonable time. Also, inspection of exposed area should be done on a regular basis, with re-planting to occur within the growing season**

Action 5: The following revision was made:

Therefore, Williamsburg Receiving and Storage LLC. has implemented two (2) phases to the sediment control measures.

1) Regular preventative maintenance
2) Response to storm events

Both phases of sediment control measures calls for replanting of exposed areas during the growing season or implementation of control measures such a hay bails or silt fencing until seeding is practical (growing season May to September)

MDEQ 6. **The basin east of the brine pits collect brine from two discharge pipes. The SPPP did not address this.**

Action 6: Section 4.1, *Diversions*, the following addition to the table was made:

Area	Material	Control Measures
Brine Pit Area / Parking Lot	Storm water	Storm water collected and relocated to storm water basins east of the brine pits to eliminate storm water contact with Brine contained within the pits.

The basin east of the brine pits ***has the potential to*** collect brine from two discharge pipes. This is a significant difference from the statement contained in the February 18, 2003 and may result in Ms. Boals or Whitewater Township official to reach an erroneous conclusion regarding conditions at WRS. The following data is obtained from sampling of these discharge pipes in accordance with the Consent Order. These data do not indicate that storm water is affected by brining operations.

	Outfall Sampling Results- Brining Pit Area					
	Units	Analysis Method	North Pipe 05/05/03	South Pipe 05/20/03	North Pipe 06/10/03	South Pipe 07/10/03
BOD_5	(mg/L)	405.1	< 67	57	12	27
Chloride	(mg/L)	325.2	6	4	3	5
Phosphorous (Total)	(mg/L)	365.4	0.96	0.25	0.21	0.08
Sodium	(mg/L)	273.1	5.06	2.59	5.0	13.4

We anticipate the above modifications will satisfy the recommendations in the February 18, 2003 letter. We look forward to discussing any further questions or comments you may have regarding these matters. Please feel free to contact me with any questions regarding these revisions at 231.933.4041.

Sincerely:
INLAND SEAS ENGINEERING, INC.

Mindy D. Walters, PE
Project Manager

cc w/o encl: Christopher Hubbell- WRS
Andrew J. Smits- ISE
Joseph Quandt – Zimmerman, Kuhn, Darling, Boyd, Taylor, & Quandt
Edgar Roy III – Brandt, Fisher, Alward & Roy

Encl. Excerpts from August 2003, SWPPP Modifications

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- **Employee Training**
  Employee training will be a major component in enduring the success of the facilities SWPPP. The more knowledgeable all employees are about the facility's SWPPP and what is expected of them, the greater the chance that the plan will be successful.

  The following is a description of the employee training programs to be implemented to inform appropriate personnel at all levels of responsibility of the components of the SWPPP.

  Williamsburg Receiving and Storage LLC. has charged it's employees with the first line of defense from storm water to be in-contact with processing materials at the plant. Therefore, WRS has developed a training program for those who transfer materials outside the confines of the plant as to there responsibilities, including but not limited to good house keeping practices, spill prevention, and spill response.

  WRS has included a list of the topics covered in training sessions and employees included as Standard Operating Procedure No. 7. With completed training documented under Employee Training.

- **List of Significant Materials Still Present**
  After non-structural controls at the site are in place there are still some areas that require additional measures to eliminate contact with storm water. These areas require structural controls:

Material	Location	Outfall	Planned Control Measure
Storm water a top Brine Pits	Brine Pits on East side of Property	No Outfall	Storm water to be relocated into re-designated Brine Pits for testing prior to disposal and/or irrigation.
Brine / Cherries	Between Brine Pits and Plant	No Outfall	Secondary Containment on distribution line

4.2 Structural Controls

After application of all non-structural control measures at the site, there will be some controls installed to reduce or eliminate the presence of pollutants in storm water. This involves installation of structural control measures on the site.

- **Preventative Measures**
  Preventative measures are controls which are intended to prevent exposure of storm water to contaminates.

  The following preventative measures have been chosen for this facility.

Area	Material	Control Measures
Brine Pits	Brine/ Cherries	Some Brine Pits re-designated for storm water only
Brine Distribution Line	Brine/ Cherries	Visual Inspection of Line Prior to and during product transfer
Brine Distribution Line Connections	Brine/ Cherries	Connections will be contained by utilizing a spill pan or similar

3.0 POTENTIAL SOURCES OF POLLUTANTS

3.1 Site Maps

Included in Attachment A are several maps that indicate the feature present at the site. The following is a listing of enclosed maps:

Figure 1:	Site Location Map
Figure 2:	Site Features Diagram- General Vicinity
Figure 3:	Site Feature Diagram – WRS Property Only
Figure 4:	Exposed and/or erodible soils, vegetation, impervious surfaces and processing

3.2 Inventory of Exposed Materials

Williamsburg Receiving and Storage, LLC. management have evaluated the potential exposure scenarios at the site, based on current and proposed uses at the site. The following potential exposures have been determined:

Area/ Process	Material	Method of Exposure	Outfall
Area 3/4- Brine Pits	Brine	Storm water on raw /or intermediate materials	**Sheet flow, no current outfalls**
Area 1- Factory	Finished Products	Spill at Loading Dock	**Sheetflow, no current outfalls**
Area 1- Factory	Fresh Cherries, Intermediate Products	Storm event during unloading	**Sheetflow, no current outfalls**

3.3 List of Past Spills and Leaks

A list of past spills to be known to have occurred at the site is included as Table 1. This table will be updated after each spill or leak and records will be maintained for a minimum of three (3) years.

3.4 Summary of Sampling Data

The following is a summary of sampling data available for Williamsburg Receiving and Storage LLC.

Date	Location	Parameter	Range	Sampled by	Analyst	Changes
10/31/02	Munro Rd.	BOD	<200 mg/L*	TJG	KMC	
10/31/02	Munro Rd.	Chloride	3 mg/L	TJG	KMC	
10/31/02	Munro Rd.	Phosphorus	<0.25 mg/L	TJG	KMC	
10/31/02	Munro Rd.	Sodium	3.05 mg/L	TJG	KJ	

*= Due to removal of the Munro Road Discharge Pipe, an additional sample at the proper Method Detection Limit was not attainable. Future BOD5 analyses for evaluation of storm water will specify a MDL<5 mg/L

4.0 BEST MANAGEMENT PRACTICES

Williamsburg Receiving and Storage LLC. has identified that the following practices are necessary for current site activities and those proposed in the future. These storm water management controls, or best management practices (BMPs), will be implemented to reduce the amount of pollutants in storm water. All practices addressed have been implemented prior to execution of this plan.

WRS has implemented several management practices to reduce the potential for impact to storm water. The following is a brief summary of the BMP that have been made at the site to reduce the potential impact to storm water.

1. WRS has made a commitment to reduce dry chemical storage on-site.
2. WRS has restructures the Brine mixing operations so that all mixing is done within the confines of the building.
3. Brine distribution lines are connected from the pit to the plant utilizing double lined piping.
4. WRS has eliminated the outdoor storage of totes associated with plant processes.
5. Implement spill response and Prevention Procedures through out the facility

4.1 Non-Structural Controls

Non-structural controls are practices that are specifically intended to reduce the amount of pollution getting into surface waters. There are generally implemented to address the problem at the source. They do not require any structural changes to the facility. The following non-structural controls have been implemented.

- **Preventative Maintenance**

  A preventative maintenance schedule has been implemented to inspect, test and clean facility and operational systems. Thus reducing the possibility of impacting the storm water due to a release of from the systems.

  The following equipment/activities will be included in the preventive maintenance program.

Equipment / Activity	Task	Frequency
Visual inspection	Site walkover of drive areas for production materials or refuse	Daily
Storm water Basins	Visual Inspection of basins for obstructions, erosion or other maintenance requirements	Weekly
Non-Vegetative Areas	Visual Inspection for erosion	Weekly
Dry Chemical Storage	Inventory chemicals and determine if there are any that have excessive quantities	Bi-Weekly
Hi-Lows	Routine Maintenance- Reduction of Possible leaks	Monthly
Dozer	Routine maintenance- reduction of possible leaks	Semi-Annual
Back Hoe	Routine maintenance- reduction of possible leaks	Semi-Annual
Other Equipment*	Routine maintenance- reduction of possible leaks	Semi- Annual

  * A complete list of equipment owned and/or maintained by Williamsburg Receiving and Storage LLC, is included as Table 2.

- **Semi-Annual Comprehensive Inspections**
  Comprehensive Inspections of the facility components are required as part of the general permit conditions. Williamsburg Receiving and Storage LLC. has developed the following schedule for semi-annual inspections. In addition, a complete record of inspections will be kept on file in the office, for a minimum of three (3) years.

  Due to the typical schedule of activities at WRS, We have determined that the best time to complete these semi-annual inspections, is during the processing months. Therefore, we have determined that April and October would be the appropriate times for this comprehensive inspection.

  WRS storm water pollution prevention team has developed a standard operating procedure and inspection form for this inspection. A copy of a draft is included as Appendix A.

- **Good Housekeeping Practices**
  To assist the storm water operator with daily maintenance activities at Williamsburg Receiving and Storage LLC., all workers at the plant are charged with keeping up the plant and surrounding areas in a clean and maintained condition. This includes reporting to the maintenance supervisor any spills at the site, sweeping of paved areas, and general professional appearance of the site.

- **Spill Prevention and Response Procedures**
  Spills and leaks together are the largest industrial source of storm water pollution, Thus, this SWPPP specifies material handling procedures and storage requirements for any significant materials. A spill prevention and response plan is included as Standard Operating Procedure No. 5.

- **Sedimentation Control Measures**
  There may be certain areas of the facility that are prone to soil erosion, These areas need to be protected, and the soil kept out of the storm water discharge. (if there are no areas prone to soil erosion state that in this section)

  Due to the drastic elevation change between the plant and the surrounding properties to the North and West sedimentation control measures are necessary at the site to limit silt and sediment from traveling to the limits of the site. Therefore, Williamsburg Receiving and Storage LLC. has implemented two (2) phases to the sediment control measures.
  1) Regular preventative maintenance
  2) Response to storm events

  Both phases of sediment control measures calls for replanting of exposed areas during the growing season or implementation of control measures such a hay bails or silt fencing until seeding is practical (growing season May to September)

- **Diversions**
  Diversion practices are structures (including grading and paving) that are used to divert storm water away from high risk areas and prevent contaminants from mixing with the runoff, or to channel contaminated storm water to a treatment facility or containment area.

  The following areas are to be protected through the use of diversion structures.

Area	Material	Control Measures
East ramped entrance to the Plant	Storm water / Plant materials	The ramp into the plant on the east side is sloped so that waters within the plant don't leave and storm water doesn't enter the plant
East Side of Plant	Storm water	Conveyance on the North ½ of the Plant. Eliminate Storm water from ponding into the building
Brine Pit Area/ Parking Lot	Storm water	Storm water collected and relocated to storm water basins east of the brine pits to eliminate storm water contact with Brine contained within the pits.

- **Containment**
  Containment areas are structures designed to hold pollutants or contaminated storm water to prevent it from being discharged to surface waters. These structures can range from drip pans to large containment areas required for Pollution Incident Prevention Plans (PIPP) or Spill Control and Countermeasures (SPCC) plans.

  Containment structures have been installed in the following areas.

Area	Material	Control Measures
Brine Distribution Line Connections	Brine / Cherries	Drip Pans
Brine Pits	Storm water - Potentially brine/cherries	Storm water collected on brine pit covers will be monitored to prevent overflowing and pumped into dedicated basins

7.0 CERTIFICATION OF THE SWPPP

I certify under penalty of law that this SWPPP has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. In addition, at the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

(Signature of Certified Operator)	I-06781 (Certification Number)
Ms. Mindy Walters, PE (Printed Name)	8/7/03 (Date)
(Signature of Corporate Officer)	Aug 8-03 (Date)
Mr. Christopher Hubbell (Printed Name)	President (Title)

Retain a copy of this certification with the SWPPP and submit a copy with the original signatures to the MDEQ office in your area.